UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket Nos. 50-275
PACIFIC GAS AND ELECTRIC COMPANY	)	50-323
	)	
(Diablo Canyon Nuclear Power Plant, Unit Nos. 1 and 2)	)	(Full Power Proceeding)

AFFIDAVIT OF JOHN B. HOCH

STATE OF CALIFORNIA)
) ss.
CITY AND COUNTY OF SAN FRANCISCO)

JOHN B. HOCH, being duly sworn, deposes and says:

My name is John B. Hoch. I am Manager of Nuclear Projects for Pacific Gas and Electric Company (PGandE). I hold a Bachelor of Science degree in Mechanical Engineering. I am a registered Mechanical Engineer and Nuclear Engineer in the State of California. I have over twenty-one years of power plant related experience of which ten years were nuclear related and eight years of which have been directly related to the Diablo Canyon Power Plant.

This affidavit relates to Joint Intervenors Contention 10 as set forth in the ASLB Prehearing Conference Order of February 13, 1981.

I attest that:

1) The pressurizer heaters and associated controls for the Diablo Canyon Power Plant (DCPP) are not required to maintain natural circulation at hot standby conditions.

2) Tests performed during the low power test portion of reactor startup at other Westinghouse PWRs have shown that the pressurizer heaters are not needed to maintain natural circulation in a hot standby condition.

3) Alternate means are available to provide pressure control in the Reactor Coolant System (RCS) without the use of the pressurizer heaters.

4) The capability to maintain natural circulation is important to safety.

5) Methods other than the use of pressurizer heaters are available for maintaining pressure control in the RCS. These methods use systems and components designed to meet safety grade requirements.

6) There are no requirements for the pressurizer heaters and associated controls to be classified as "components important to safety."

7) Since the pressurizer heaters and associated controls are not classified as "components important to safety," they are not required to meet safety-grade design criteria found in Appendix A of 10 CFR 50.

8) The Staff has stated in Item II.E.3.1 of NUREG-0737 that the pressurizer heaters are non-class IE loads.

9) Non-class IE components are not required to meet safety-grade design criteria, e.g., withstand natural phenomena such as earthquake, tornado, floods, etc.

10) To meet the requirement of Item II.E.3.1 of NUREG-0737, PGandE has designed and installed modifications which allow power to the pressurizer heaters to be provided from the emergency power supply when offsite power is not available.

11) PGandE has considered the safety, regulatory and engineering aspects related to providing power to the pressurizer heaters from the emergency power supply.

12) The means to provide emergency power to the pressurizer heaters is consistent with the positions and clarifications in Item II.E.3.1 of NUREG-0737.

13) The NRC Staff has accepted PGandE's design of the means to provide emergency power to the pressurizer heaters as documented on pages 2-20 and 2-21 of Supplement 14 of the DCPP Safety Evaluation Report.

14) The pressurizer heater design associated with the capability of obtaining power from the onsite emergency power supply meets GDC 10, 14, 15, 17 and 20 of Appendix A to 10 CFR 50 as required by Item II.E.3.1 of NUREG-0737.

15) The pressurizer heaters and associated controls meet both the requirements of Item II.E.3.1 of NUREG-0737 and GDC 17 in terms of emergency onsite power supplies for the pressurizer heaters.

16) Item II.E.3.1 does not require the pressurizer heaters or associated controls to be designed to safety grade requirements.

JOHN B. HOCH

Subscribed and sworn to before me
this 21st day of December, 1981

Theodora Cooke, Notary Public in
and for the City and County of
San Francisco, State of California

My Commission expires January 28, 1985